



August 16, 2024

**VIA ECF**

Honorable Jessica S. Allen, U.S.M.J.  
U.S. District Court for the District of New Jersey  
Martin Luther King Jr. Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

**Re: *White, et al. v. Samsung Electronics America, Inc., et al.***  
**Case No. 17-1775 (MCA)(JSA)**

Dear Magistrate Judge Allen:

In accordance with the parties' August 2, 2024 joint letter to the Court, ECF No. 355, the parties write to update the Court on their discussions following the Mediation session held on June 25, 2024 with Judge Jose L. Linares (Ret.). The parties are continuing to discuss with Judge Linares potential avenues to resolve this matter. On June 28, 2024, Plaintiffs submitted a settlement proposal. On July 29, 2024, SEA provided a counterproposal. Plaintiffs provided edits to SEA's counterproposal on August 1, 2024.

Judge Linares and the parties have tentatively scheduled, pending Samsung's confirmation, a remote conference on Tuesday, August 20, 2024 at 2:00 p.m. ET, to discuss the parties' positions and whether any potential avenues to resolve this matter remain.

Respectfully submitted,

s/ Gregory S. Mullens

Gregory S. Mullens  
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s/ Michael R. McDonald

Michael R. McDonald

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cc: All Counsel of Record (via ECF)